

**PETER E. MCKEEVER**  
**LAW OFFICE OF PETER E. MCKEEVER, LLC**  
6302 Southern Circle  
Monona, WI 53716  
608-223-1275  
608-223-9329 FAX  
petermckeever@charter.net

September 11, 2014

Ms. Sandra J. Paske  
Secretary to the Commission  
Public Service Commission of Wisconsin  
PO Box 7854  
Madison, WI 53707-7854

Re: Application of Highland Wind Farm Docket # 2535-CE-100

Dear Ms. Paske,

Forest Voice, Inc. a party to the above-referenced proceeding, objects to the applicant's request for a two year extension of the time to begin construction. (PSC REF # 215747).

There is no statutory basis for a two year extension. The applicable regulations imply at most a one year extension. In two years, on October 25, 2016, the application will no longer be timely; conditions, technology, and the market will have changed so significantly that an applicant should be required to submit a new application. The application on which the CPCN was granted will then be almost five years old, having been filed on December 19, 2011. It is very likely that by then the applicant will desire to construct a project that differs in significant and important ways from the project originally proposed, and the public and the Commission should have the opportunity to review it.


Any extension which is granted should not be an arbitrary period of one or two years. It should instead be no longer than the applicant believes is reasonably required to commence construction, and the applicant ought to be required to show what that extension period should be. The default should not be two years, or even one, but rather some period of time specifically related to the reason why an extension is requested.

Forest Voice requests a hearing on the request for an extension in order to give the public an opportunity to comment on it and to explore the length of the extension, if any.

Sincerely,

Law Office of Peter E. McKeever, LLC

By



Peter McKeever  
Attorney

cc: John Wilson, Marcel Olivera, John Lorence, electronically